

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0673

Comment submitted by F. Tutman

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## Submitter Information

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## General Comment

We recommend that the Maryland WIP devote more attention to the small waste water treatment plants [WWTPs] that have a profound effect on certain rivers. For example, the Galena, Maryland plant is ranked low in Maryland's funding and receives no grants, yet it is the source of half of the nutrients in the Sassafras river, and has a very direct discharge to the Bay. The Sassafras watershed has been identified in the Chesapeake Bay Program data and presentations as "hot" -- ie -- a land area contributing more nutrients and needing greater emphasis since it has a greater affect on the main stem. A tiny amount of money, well placed in these and similar minor WWTPs could go far in improving certain critical ecosystems. But since the WWTP is small, it is ignored by the Maryland WIP, even though, relatively speaking, its upgrade could have a great beneficial impact. Likewise, we have identified four wastewater treatment plants that discharge to the Patuxent River which serve mobile homes courts and which have been operating since the 1960's. These plants do not meet "BNR" standards, do not monitor for phosphorous or nitrogen, have no caps for these constituents in their state issued permits, and are presently under no compulsion to upgrade even after some forty years of continuous operation using obsolete technology. It is hard to imagine how the State could ever contemplate a meaningful TMDL when on record, the State has failed to identify the contribution of these four facilities (and perhaps others?) to the impairment of our river. Additional diligence is clearly needed to regulate these plants that while perhaps small on some aggregate level, can have a huge impact cumulatively on the outcome of any efforts to restore water quality.